

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

YOON DOELGER, and  
PETER DOELGER,

*Plaintiffs,*

No. 1:21-cv-11042-AK

vs.

JPMORGAN CHASE BANK, N.A., and  
CHICKASAW CAPITAL MANAGEMENT,  
LLC,

*Defendants.*

**JPMORGAN CHASE BANK, N.A.’S MOTION TO ENJOIN PLAINTIFFS FROM  
PURSUING THEIR DUPLICATIVE FINRA ARBITRATION**

Defendant JPMorgan Chase Bank, N.A. (“JPMC”) respectfully moves to enjoin Plaintiffs Yoon Doelger and Peter Doelger (“Plaintiffs”) from pursuing their duplicative FINRA arbitration (FINRA Case. No. 23-02750, the “Arbitration”) as contradictory to the JPMC’s choice of forum clauses, these proceedings, and this Court’s jurisdiction and rulings. As grounds for this motion (the “Motion”), JPMC relies upon and incorporates by reference: (a) the arguments contained in the supporting Memorandum; and (b) the declaration of Tracy O. Appleton and the exhibits thereto.

In conjunction with this Motion, JPMC is filing herewith:

1. JPMC’s Memorandum of Law in Support of its Motion to Enjoin Plaintiffs From Pursuing Their Duplicative FINRA Arbitration; and
2. Declaration of Tracy O. Appleton and associated exhibits.

**WHEREFORE**, JPMC respectfully requests that the Court enter an injunction precluding Plaintiffs from pursuing their duplicative FINRA arbitration.

Dated: February 28, 2024

Respectfully submitted,



**DONTZIN NAGY & FLEISSIG LLP**

Tibor L. Nagy, Jr.\*

Tracy O. Appleton\*

William H. LaGrange\*

31 East 62<sup>nd</sup> St.

New York, New York 10065

Tel: 212.717.2900

tappleton@dnflp.com

**MANATT, PHELPS &  
PHILLIPS LLP**

Joan A. Lukey

177 Huntington Ave.

Boston, MA 02115

Tel: 617.646.1448

jlukey@manatt.com

*Attorneys for Defendant JPMorgan Chase  
Bank, N.A.*

**CERTIFICATE OF SERVICE**

I, Tracy O. Appleton, hereby certify that this document filed through the CM/ECF system was served electronically to the registered participants as identified on the Notice of Electronic Filing on February 28, 2024, and that paper copies will be sent to those indicated as non-registered participants on February 28, 2024.

/s/ Tracy O. Appleton  
Tracy O. Appleton